

# Auto Body Refinishing

Environmental Protection Agency-Region 3

National Emission Standards for Hazardous Air  
Pollutants: Paint Stripping and Miscellaneous Surface  
Coating Operations  
40 CFR Part 63 Subpart HHHHHH



# Background: The Clean Air Act

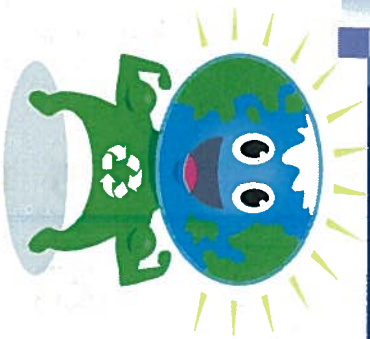
- The Clean Air Act (CAA) is enacted by Congress which details required elements for EPA.
  - directs EPA to reduce exposure to chemicals that are known, or suspected, to cause cancer or other serious health effects, such as birth defects. There are 187 Hazardous Air Pollutants (HAPs)
  - requires EPA to identify and regulate the sources that pose the greatest potential health threats from the pollutants in urban areas. In urban areas, these are generally small sources but large in number and collectively may pose health risks. These are known as area sources.



# Background

- Auto body refinishing has been identified as one of the area source categories that need to be regulated.
- Data from paint suppliers has shown that coatings used in automobile and mobile equipment refinishing contain HAPs such as chromium, lead, cadmium, manganese, and nickel compounds (targeted HAPs).





# Reasons to comply

- Protect worker health and safety
  - Through implementing best practices, which include installing and maintaining control equipment and using safer paints and solvents, toxic exposures are expected to be reduced by 90%.
- Save time and money
  - Shop owners can reduce paint and solvent costs, as well as related hazardous waste disposal costs through this program.
- Happier and healthier community neighbors





# Who is affected by the rule?

- All Auto body refinishing operations
  - You may apply for exemption if you can demonstrate that you spray apply NO coatings that contain the target HAPs (Cr, Pb, Mn, Ni, Cd)
- Paint stripping operations that use Methylene Chloride (MeCl)
- Other spray coating operations of metal and/or plastics parts, where the coating applied contains chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)


# The final rule does *not* apply to surface coating or paint stripping operations performed:



- On site owned or operated by US Armed Forces, NASA, or Nation Nuclear Security Administration
- On military munitions, manufactured by or for the US Armed Forces or equipment directly and exclusively used to transport military munitions.



- By individuals on their personal vehicles, possessions, or property or for others without compensation. Anyone spraying coating two or more vehicles per year, regardless of compensation, is subject to the rule.
- As “research and laboratory activities” or “quality control activities” (including color matching activities)



## The final rule *does not* apply to the following activities:

- Where all coatings are applied from a hand-held device with a paint cup capacity equal to or less than 3 ounces
- The use of powder coatings, hand-held non-refillable aerosol containers, or other non-atomizing techniques (brushes, rollers, hand wiping, flow coating, dip coating, etc)
- Thermal spray operations



**What are the requirements  
of the final rule?**



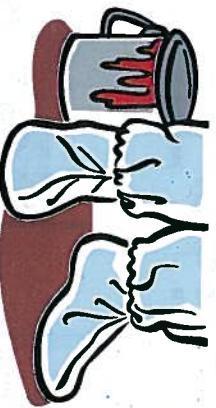
# Training requirements:



- All painters must be certified, every five years.
- No specifications for any one training provider or program--allows flexibility for best options decided by the shop owner/operator.
- Certification training must include **hands-on and classroom** instruction that addresses all of the following:
  - Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
  - Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
  - Routine spray booth and filter maintenance, including filter selection and installation.
  - Environmental compliance with this rule.

# Spray Booth Requirements:

- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following:
  - Fitted with a filter technology achieving at least 98% capture of paint overspray
    - may use published filter efficiency provided by filter vendor.
  - Fully enclosed with a full roof and four complete walls or side curtains, and must be ventilated at negative pressure
  - Booths used to coat miscellaneous parts (other than mobile equipment), must have a full roof and at least three complete walls or side curtains



# Spray gun requirements:

- All spray-applied coatings must be applied with a HVL<sub>P</sub> spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology.

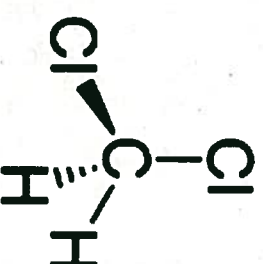


- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent is not created outside of a container that collects used gun cleaning solvent.

□ For example:

- hand cleaning of parts of the disassembled gun,
- flushing solvent through the gun without spraying,
- fully enclosed parts washer.

# Paint Stripping



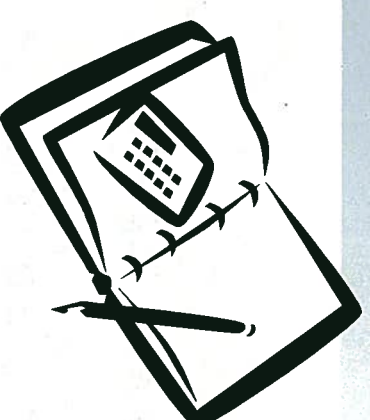
- Apply practices to minimize the emissions of MeCl, such as:
  - evaluate each application to ensure the need for paint stripping
  - see if there is an alternative paint stripping technology that can be used
  - practice proper storage and disposal on products containing MeCl, store in closed, air tight containers.
- Each paint stripping operation using more than one ton of MeCl per year must develop and implement a written MeCl minimization plan.
- Keep record of annual usage of MeCl







# Recordkeeping:



- Certification records for each painter (including dates of initial cert and 5-year refresher)
- Documentation of filter efficiency
- Documentation of approval of any spray gun not initially covered by the rule
- Copies of notification submitted
- Records of paint strippers used that contain MeCl (if using more than 1 ton MeCl, must also keep MeCl minimization plan on site)



# Important Dates:



- Existing sources (in operation prior to September 17, 2007)
  - ☐ Notification date: January 11, 2010
  - ☐ Compliance date: January 11, 2011
- New sources
  - ☐ Notification date: no later than 180 days after initial startup or July 7, 2008, whichever is later
  - ☐ Compliance:
    - If initial start up is after September 17, 2007: Compliance date: January 8, 2008
    - If initial start up is after January 9, 2008: Compliance date is initial start up

# Notification Forms:

- Notification forms and requests for exemption for sources in DE, DC, MD, PA, VA, WV should be sent to:

US Environmental Protection Agency –

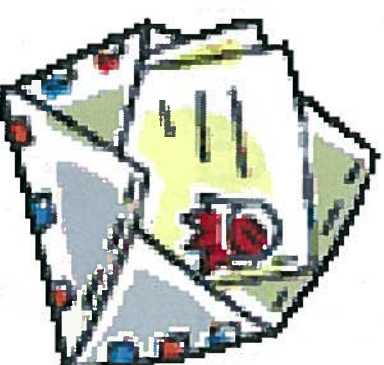
Region 3

1650 Arch St.

Philadelphia, PA 19103

Mailcode 3AP10

Attn: Auto Refinishers Notification





# Notification Forms:



- Also send a copy your local Air Agency (see <http://www.4cleanair.org/contactUsaLevel.asp> for addresses)
- A sample form is available at: <http://www.epa.gov/collisionrepair/>





# Additional Questions?



Contact:

Cathleen Kennedy, US EPA Region 3

[kennedy.cathleen@epa.gov](mailto:kennedy.cathleen@epa.gov) or

215-814-2746

